



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

March 2, 1993

Mr. Brad Bradley
USEPA - HSRL - 6J
77 West Jackson
Chicago, IL 60604

Re: 1190400007 -- Madison County
Taracorp/NL Industries
Superfund/Tech

Dear Mr. Bradley,

The Illinois Environmental Protection Agency (IEPA) has reviewed the Explanation of Significant Differences (ESD) for the NL Industries/Taracorp Site, Granite City, IL. Based on this review, the IEPA provides the following comments:

1. Page 6. Section entitled Description of the Significant Differences and the Basis for Those Differences. Paragraph 1. The existing ROD states that the excavated soils from residential properties and battery case materials in Venice Eagle Park Acres, and any other nearby communities with lead concentrations above 500 ppm may be either incorporated with the Taracorp waste pile OR disposed of off-site. The IEPA does not see the necessity of the ESD, calling for off-site disposal of contaminated material when this is already defined in the ROD.
2. -Paragraph 2. Please amend the first sentence. After the semi-colon, the sentence should read: "due to the results of the most recent groundwater sampling events performed in 1992, which show elevated levels of lead and other contaminants, above regulatory limits downgradient from the Taracorp pile, it is possible..."
3. -The expected increase in cost for the off-site disposal of materials is given as "\$200,000." However, the Amended State Superfund Contract (SSC) reflects that the cost difference is \$2,000,000. Please explain this discrepancy.
4. Affirmation of the Statutory Determinations section. Page 6. Has the selected remedy been changed? See comment 1 above.

Please contact me if you have questions pertaining to the above comments, and notify me of proposed changes to the ESD document. I can be reached at 217/782-6760.

Sincerely,

Brian Culnan

Brian Culnan, Remedial Project Manager
Federal Site Management Unit
Remedial Project Management Section
Bureau of Land